

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PABLO STAR LTD.,

Plaintiff,

v.

THE WELSH GOVERNMENT, *et al.*,

Defendants.

Civil Action No. 15-CV-1167

DECLARATION OF REINA PONCE

1. My name is Reina Ponce. I am over eighteen (18) years of age and am competent to make this declaration. I have personal knowledge of the facts stated herein and they are true and correct to the best of my knowledge, information and belief. I would testify to the facts set forth herein if called upon to do so.

2. I am the Vice President/Chief Financial Officer at Miami Herald Media Company ("Miami Herald"). In my position at Miami Herald, I direct and manage all aspects of finance for the Miami Herald including budgeting and forecasting, credit and collections, billing and rating for advertising and circulation, payroll, accounts payable and expenditure approvals, general ledger accounting and month-end reporting.

3. Miami Herald is a company organized and existing under the laws of the State of Delaware with its principal place of business in Doral, Florida.

4. The Miami Herald is a newspaper with circulation in Miami-Dade, Broward and Monroe counties in South Florida.

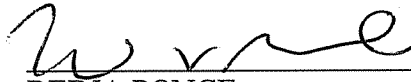
5. Miami Herald owns and operates a website at www.miamiherald.com. This website was created and is maintained in Florida, and hosted on servers in North Carolina. This website only has 26 subscribers from New York.

6. Miami Herald does not maintain an office in New York, does not solicit business targeting New York consumers, does not maintain any bank accounts in New York, does not own, use or possess any real property in New York, and does not have employees or agents in New York.

7. Miami Herald has only a small number of paper and web subscribers located in New York [33] and the amount of revenue received from such sales is de minimis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 20, 2015


REINA PONCE